

Stacey M. Leyton (SBN 203827)  
Barbara J. Chisholm (SBN 224656)  
Danielle Leonard (SBN 218201)  
ALTSHULER BERZON LLP  
177 Post Street, Suite 300  
San Francisco, CA 94108  
Tel: (415) 421-7151  
Fax: (415) 362-8064  
sleyton@altber.com  
bchisholm@altber.com  
dleonard@altber.com

Elena Goldstein (pro hac vice)  
Skye Perryman (pro hac vice)  
Tsuki Hoshijima (pro hac vice)  
DEMOCRACY FORWARD  
FOUNDATION  
P.O. Box 34553  
Washington, DC 20043  
Tel: (202) 448-9090  
Fax: (202) 796-4426  
egoldstein@democracyforward.org  
sperryman@democracyforward.org  
thoshijima@democracyforward.org

*Attorneys for Plaintiffs*

[Additional Plaintiffs' counsel and affiliations listed on signature page]

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

CRAIG H. MISSAKIAN  
United States Attorney  
450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495  
Telephone: (415) 436-7200  
Fax: (415) 436-6748

ERIC J. HAMILTON (CABN 296283)  
Deputy Assistant Attorney General  
DIANE KELLEHER  
Branch Director  
CHRISTOPHER HALL  
Assistant Branch Director  
ANDREW M. BERNIE  
Trial Attorney  
Civil Division, Federal Programs Branch  
950 Pennsylvania Avenue NW  
Washington, DC 20530  
Telephone: (202) 514 3511  
andrew.bernie@usdoj.gov

*Attorneys for Defendants*

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO,  
*et al.*

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as  
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698-SI

**STIPULATION TO EXTEND TIME TO  
RESPOND TO DEFENDANTS' MOTION  
TO DISMISS**

Pursuant to Civil Local Rules 6-2 and 7-12, the parties hereby stipulate and respectfully request that the Court extend for two weeks the time for Plaintiffs to file an opposition to Defendants' Motion to Dismiss. In support of this stipulation, the parties state as follows:

The parties previously stipulated to a three-week extension for the deadline for Defendants to respond to Plaintiffs' amended complaint to July 21, 2025. ECF 175. On July 21, 2025, Defendants filed a motion to dismiss Plaintiffs' amended complaint. ECF 216. Plaintiffs' opposition to this motion is currently due on August 4, 2025. Civ. L.R. 7-3(a). In light of other deadlines in this case, on July 24, 2025, Plaintiffs requested and Defendants have consented to a two week extension on the response to the motion to dismiss, until August 18, 2025.

DATED: July 29, 2025

Respectfully submitted,

Stacey M. Leyton  
Barbara J. Chisholm  
Danielle E. Leonard  
Corinne F. Johnson  
Alice X. Wang  
Robin S. Tholin  
ALTSHULER BERZON LLP  
177 Post St., Suite 300  
San Francisco, CA 94108  
Tel: (415) 421-7151  
sleyton@altshulerberzon.com  
bchisholm@altshulerberzon.com  
dleonard@altshulerberzon.com

By: /s/ Danielle Leonard<sup>1</sup>

*Attorneys for All Union and Non-Profit Organization  
Plaintiffs*

Elena Goldstein (pro hac vice)  
Skye Perryman (pro hac vice)  
Tsuki Hoshijima (pro hac vice)  
DEMOCRACY FORWARD FOUNDATION  
P.O. Box 34553  
Washington, D.C. 20043  
Tel: (202) 448-9090  
Fax: (202) 796-4426

<sup>1</sup> In compliance with Civil Local Rule 5-1(i)(3), the filer of this document attests under penalty of perjury that all signatories have concurred in the filing of this document.

egoldstein@democracyforward.org  
sperryman@democracyforward.org  
thoshijima@democracyforward.org

By: /s/ Tsuki Hoshijima

*Attorneys for All Union and Non-Profit Organization  
Plaintiffs (except NRDC) and for Plaintiffs City of  
Chicago, IL; Martin Luther King, Jr. County, WA;  
Harris County, TX; and City of Baltimore, MD*

Jules Torti (pro hac vice)  
PROTECT DEMOCRACY PROJECT  
82 Nassau St., #601  
New York, NY 10038

Erica J. Newland (pro hac vice)  
Jacek Pruski (pro hac vice)  
PROTECT DEMOCRACY PROJECT  
2020 Pennsylvania Ave., N.W., Suite 163  
Washington, D.C. 20006  
Tel: 202-579-4582  
jules.torti@protectdemocracy.org  
erica.newland@protectdemocracy.org  
jacek.pruski@protectdemocracy.org

By: /s/ Jacek Pruski

*Attorneys for All Union and Non-Profit Organization  
Plaintiffs (except NRDC)*

Norman L. Eisen (pro hac vice)  
Spencer W. Klein (pro hac vice)  
STATE DEMOCRACY DEFENDERS FUND  
600 Pennsylvania Avenue SE #15180  
Washington, D.C. 20003  
Tel: (202) 594-9958  
Norman@statedemocracydefenders.org  
Spencer@statedemocracydefenders.org

By: /s/ Norman L. Eisen

*Attorneys for All Union and Non-Profit Organization  
Plaintiffs (except NRDC)*

Rushab Sanghvi (SBN 302809)  
AMERICAN FEDERATION OF GOVERNMENT  
EMPLOYEES, AFL-CIO  
80 F Street, NW

1 Washington, D.C. 20001  
2 Tel: (202) 639-6426  
3 Sanghr@afge.org

4 By: /s/ Rushab Sanghvi

5 *Attorneys for Plaintiffs American Federation of*  
6 *Government Employees, AFL-CIO (AFGE) and*  
7 *AFGE locals*

8 Teague Paterson (SBN 226659)  
9 Matthew Blumin (pro hac vice)  
10 AMERICAN FEDERATION OF STATE,  
11 COUNTY, AND MUNICIPAL EMPLOYEES, AFL-  
12 CIO  
13 1625 L Street, N.W.  
14 Washington, D.C. 20036  
15 Tel: (202) 775-5900  
16 TPaterson@afscme.org  
17 MBlumin@afscme.org

18 By: /s/ Teague Paterson

19 *Attorneys for Plaintiff American Federation of State*  
20 *County and Municipal Employees, AFL-CIO*  
21 *(AFSCME)*

22 Steven K. Ury (SBN 199499)  
23 SERVICE EMPLOYEES INTERNATIONAL  
24 UNION, AFL-CIO  
25 1800 Massachusetts Ave., N.W.  
26 Washington, D.C. 20036  
27 Tel: (202) 730-7428  
28 steven.ury@seiu.org

By: /s/ Steven K. Ury

*Attorneys for Plaintiff Service Employees*  
*International Union, AFL-CIO (SEIU)*

Simi Bhat (SBN 289143)  
Katherine K. Desormeau (SBN 266463)  
NATURAL RESOURCES DEFENSE COUNCIL  
111 Sutter St Fl 21,  
San Francisco, CA 94104  
Tel: (415) 875-6100  
sbhat@nrdc.org  
kdesormeau@nrdc.org

1 By: /s/ Simi Bhat

2 *Attorneys for Plaintiff Natural Resources Defense*  
3 *Council*

4 David Chiu (SBN 189542)  
5 City Attorney  
6 Yvonne R. Meré (SBN 175394)  
7 Chief Deputy City Attorney  
8 Mollie M. Lee (SBN 251404)  
9 Chief of Strategic Advocacy  
10 Sara J. Eisenberg (SBN 269303)  
11 Chief of Complex and Affirmative Litigation  
12 Molly J. Alarcon (SBN 315244)  
13 Alexander J. Holtzman (SBN 311813)  
14 Deputy City Attorneys  
15 OFFICE OF THE CITY ATTORNEY FOR THE  
16 CITY AND COUNTY OF SAN FRANCISCO  
17 1390 Market Street, 7th Floor  
18 San Francisco, CA 94102  
19 molly.alarcon@sfcityatty.org  
20 alexander.holtzman@sfcityatty.org

21 By: /s/ Alexander Holtzman

22 *Attorneys for Plaintiff City and County of San*  
23 *Francisco*

24 Tony LoPresti (SBN 289269)  
25 COUNTY COUNSEL  
26 Kavita Narayan (SBN 264191)  
27 Meredith A. Johnson (SBN 291018)  
28 Raphael N. Rajendra (SBN 255096)  
Hannah M. Godbey (SBN 334475)  
OFFICE OF THE COUNTY COUNSEL  
COUNTY OF SANTA CLARA  
70 West Hedding Street, East Wing, 9th Floor  
San José, CA 95110  
Tel: (408) 299-5900  
Kavita.Narayan@cco.sccgov.org  
Meredith.Johnson@cco.sccgov.org  
Raphael.Rajendra@cco.sccgov.org  
Hannah.Godbey@cco.sccgov.org

By: /s/ Tony LoPresti

*Attorneys for Plaintiff County of Santa Clara, Calif.*

David J. Hackett (pro hac vice)  
General Counsel to King County Executive &  
Special Deputy Prosecutor  
Alison Holcomb (pro hac vice)  
Deputy General Counsel to King County Executive  
& Special Deputy Prosecutor  
Erin King-Clancy (pro hac vice app. forthcoming)  
Senior Deputy Prosecuting Attorney  
OFFICE OF KING COUNTY PROSECUTING  
ATTORNEY LEESA MANION  
401 5<sup>th</sup> Avenue, Suite 800  
Seattle, WA 98104  
(206) 477-9483  
David.Hackett@kingcounty.gov  
aholcomb@kingcounty.gov  
aclancy@kingcounty.gov

By: /s/ David J. Hackett

*Attorneys for Plaintiff Martin Luther King, Jr.  
County*

Sharanya Mohan (CABN 350675)  
PUBLIC RIGHTS PROJECT  
490 43rd Street, Unit #115  
Oakland, CA 94609  
Tel: (510) 738-6788  
sai@publicrightsproject.org

By: /s/ Sharanya Mohan

*Attorney for Plaintiffs Baltimore, MD, Chicago, IL,  
Harris County, TX, and King County, WA*

Christian D. Menefee  
Harris County Attorney  
Jonathan G.C. Fombonne (pro hac vice)  
Deputy County Attorney and First Assistant  
Tiffany Bingham (pro hac vice app. forthcoming)  
Managing Counsel  
Sarah Utley (pro hac vice app. forthcoming)  
Division Director – Environmental Division  
Bethany Dwyer (pro hac vice app. forthcoming)  
Deputy Division Director - Environmental Division  
R. Chan Tysor (pro hac vice app. forthcoming)  
Senior Assistant County Attorney  
Alexandra “Alex” Keiser (pro hac vice)  
Assistant County Attorney  
1019 Congress, 15th Floor  
Houston, Texas 77002  
Tel: (713) 274-5102  
Fax: (713) 437-4211

jonathan.fombonne@harriscountytexas.gov  
tiffany.bingham@harriscountytexas.gov  
sarah.utley@harriscountytexas.gov  
bethany.dwyer@harriscountytexas.gov  
chan.tysor@harriscountytexas.gov  
alex.keiser@harriscountytexas.gov

By: /s/ Jonathan G.C. Fombonne

*Attorneys for Plaintiff Harris County, Texas*

Mary B. Richardson-Lowry,  
Corporation Counsel of the City of Chicago  
Stephen J. Kane (IL ARDC 6272490) (pro hac vice  
app. forthcoming)  
Rebecca A. Hirsch (IL ARDC 6279592) (pro hac  
vice)  
Lucy Prather (IL ARDC 6337780) (pro hac vice)  
City of Chicago Department of Law,  
Affirmative Litigation Division  
121 N LaSalle Street, Suite 600  
Chicago, Illinois 60602  
Tel: (312) 744-6934  
Stephen.kane@cityofchicago.org  
Rebecca.Hirsch2@cityofchicago.org  
Lucy.Prather@cityofchicago.org

By: /s/ Stephen J. Kane

*Attorneys for Plaintiff City of Chicago*

Ebony M. Thompson  
Baltimore City Solicitor  
Sara Gross (pro hac vice app. forthcoming)  
Chief of Affirmative Litigation  
Baltimore City Department of Law  
100 N. Holliday Street  
Baltimore, Maryland 21202  
Tel: (410) 396-3947  
sara.gross@baltimorecity.gov

By: /s/ Sara Gross

*Attorneys for Plaintiff City of Baltimore*

CRAIG H. MISSAKIAN  
United States Attorney  
U.S. ATTORNEY'S OFFICE  
450 Golden Gate Avenue, Box 36055  
San Francisco, California 94102-3495

1 ERIC J. HAMILTON (CABN 296283)  
2 Deputy Assistant Attorney General  
3 DIANE KELLEHER  
4 Branch Director  
5 CHRISTOPHER HALL  
6 Assistant Branch Director  
7

*s/ Andrew M. Bernie*

Andrew M. Bernie  
950 Pennsylvania Avenue NW  
Washington, DC 20530  
Telephone: (202) 514-3511  
andrew.bernie@usdoj.gov

*Counsel for Defendants*